

*GURSEWAK SINGH VS.
LINTECH ELECTRIC, INC.*

*GURSEWAK SINGH
September 24, 2019*



ELLEN GRAUER

COURT REPORTING CO. LLC

A U.S. Legal Support Company

Original File 285398.TXT

Min-U-Script® with Word Index

*GURUSEWAK SINGH VS.
LINTECH ELECTRIC, INC.*

*GURUSEWAK SINGH
October 4, 2019*



ELLEN GRAUER

COURT REPORTING CO. LLC

A U.S. Legal Support Company

Original File 285754.txt

Min-U-Script® with Word Index

1 SINGH

2 A. No.

3 MR. MIZRAHI: Please mark this
4 Defendant's Exhibit A.

5 (Defendant's Exhibit A,
6 Complaint, marked for Identification.)

7 MR. MIZRAHI: Madam Interpreter,
8 if you would like to follow along, we
9 are referring to Exhibit A which is
10 the Complaint.

11 Q. Mr. Singh, I'm showing you a
12 copy of a Complaint that was filed on October
13 16, 2018. Please take a moment to
14 familiarize yourself with this document.
15 Please let me know when you finished
16 reviewing it.

17 A. I don't know how to read
18 English.

19 Q. Mr. Singh, have you ever seen
20 this document before?

21 A. I'm not sure because I don't
22 know how to read English so I don't know if I
23 have seen this before.

24 Q. Mr. Singh, does your name
25 appear anywhere on this document?

1 SINGH

2 with your sister about this lawsuit; is that
3 correct?

4 A. Yes.

5 Q. Could you please tell me what
6 your sister was communicating to you with
7 regards to this lawsuit?

8 A. She translate for me. She
9 doesn't tell me much. She just translated
10 the things for me.

11 Q. Mr. Singh, how long have you
12 been living at 111-01 101st Avenue in
13 Richmond Hills, New York?

14 A. About estimation one-and-a-half
15 years.

16 Q. Where were you living before?

17 A. I used to live at 113-19
18 Atlantic Avenue, Richmond Hills, zip code
19 11418.

20 Q. Mr. Singh, how long were you
21 living at the Atlantic Avenue address?

22 A. About five or six years.

23 Q. Mr. Singh, how much do you
24 currently pay in rent?

25 MR. SILVER: Now? You mean

1 SINGH

2 Q. When was this?

3 A. About October or November 2014.

4 Q. After he told you about
5 Lintech, did he tell you to go somewhere
6 specific?

7 A. So when I was working, the
8 owner of Lintech came there and Kaldeep made
9 me talk to him right there.

10 Q. Where were you?

11 A. Far Rockaway.

12 Q. What was there? What was in
13 Far Rockaway?

14 A. So next to the buildings they
15 were putting sheds so that's where I was
16 working.

17 Q. Who was putting sheds?

18 A. It was some company before
19 Lintech they were putting it.

20 Q. What was their name?

21 A. Talico.

22 Q. Who is Talico?

23 A. It's a company's name and I
24 meet with the owner. I don't know.

25 Q. They put up and take down

1 SINGH

2 sidewalk sheds?

3 A. Yes, they put and tear down the
4 sheds.

5 Q. When did you first meet Talico?
6 When did you first come to know Talico?

7 A. So I met them when I was
8 putting the shed up and I was -- they hired
9 me as an electrician there.

10 Q. When was that?

11 A. It was like towards the end of
12 2014, I don't remember, October, November
13 2014.

14 Q. How did you first meet them?
15 How did you first start working for them?

16 THE INTERPRETER: You are asking
17 -- Jason, can you please repeat the
18 question again and which company --

19 MR. MIZRAHI: Sure.

20 THE INTERPRETER: -- you are
21 talking about.

22 Q. How did you come to start
23 working for Talico?

24 A. In 2014.

25 Q. How did you start working for

1 SINGH

2 them?

3 A. So they hired me as an
4 electrician. I used to put the lights also
5 and they used to put the sheds and they
6 needed help with the electric with the wiring
7 and the cabling.

8 Q. Did someone introduce you to
9 Talico? Did you get hired directly from
10 Talico? You know, how did you start working
11 for them?

12 A. So Kaldeep Singh used to work
13 with Talico and he made me to introduce with
14 Lintech.

15 MR. MIZRAHI: You can finish the
16 translation. Sorry for cutting you
17 off.

18 THE INTERPRETER: I'm just
19 saying that I think he didn't maybe
20 understand although I was very clear
21 with my translation, but I don't know,
22 maybe I should put it another way.

23 MR. MIZRAHI: Don't put it
24 another way. I want you to translate
25 exactly what was said and then if he

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

SINGH

would like me to rephrase it, I can rephrase it.

MR. SILVER: Let me see if I get this right. You don't think he understood the question that you asked him; is that correct?

THE INTERPRETER: That's what I'm thinking because then he started referring to Lintech so I don't know if he understood what he said to you guys.

MR. MIZRAHI: Madam Court Reporter, could you please tell me the last question that was asked.

THE INTERPRETER: So I asked him how --

MR. MIZRAHI: No, not you. I'm asking the court reporter. You can go off the record. If you could just tell me the last question that was posed.

(Record read.)

MR. MIZRAHI: You can ask that question again, please.

1 SINGH

2 You can interpret. Please stop
3 him if he continues to speak and you
4 are having trouble interpreting
5 because I need to know exactly what
6 he's saying, okay?

7 A. So I said that I wasn't -- that
8 I didn't work with Talico, I worked with
9 Lintech and Lintech and Talico, they used to
10 work on the sheds.

11 MR. MIZRAHI: Madam Court
12 Reporter, if we can go off the record
13 and you can repeat back some of the
14 responses to the questions that were
15 posed not too long ago I would like
16 to review the record.

17 (Record read.)

18 MR. MIZRAHI: Back on the
19 record.

20 Q. So when Talico brought you to
21 this job site in Far Rockaway, there was a
22 company putting up and dismantling sidewalk
23 sheds; is that correct?

24 THE INTERPRETER: I'm sorry, I
25 cannot hear anyone.

1 SINGH

2 MR. MIZRAHI: Is that better?

3 THE INTERPRETER: Yes, that's
4 much better.

5 Q. In 2014 when your friend took
6 you to Far Rockaway, there was a company
7 erecting and dismantling sidewalk sheds; is
8 that right?

9 A. Yes, he took me for the
10 electric job there.

11 Q. You said there was a company
12 there by the name of Talico, right?

13 A. Yes, Talico is making the sheds
14 and I was doing the electric job for the
15 sheds.

16 Q. How do you know Talico?

17 A. I just got to know them on the
18 site.

19 Q. Who do you know from Talico?

20 A. So the owner of Talico, he just
21 met us on the site while we were working
22 there on and off and that's how we just got
23 to know him.

24 Q. What was his name?

25 A. Manmod Singh.

1 SINGH

2 MR. MIZRAHI: Can you ask him to
3 repeat the name, please?

4 A. Manmod. His name was Manmod
5 Singh.

6 Q. Did you and Manmod Singh ever
7 communicate over text?

8 A. I don't know English. How can
9 I text him?

10 Q. How did you and Manmod Singh
11 communicate?

12 A. Sometimes he used to come on
13 the site and we just talk there.

14 Q. What did you guys talk about?

15 A. We will communicate about the
16 work that he will tell me, for example, we
17 are putting the shed here, you can put the
18 lights here.

19 Q. Would he direct how you worked?
20 Would he direct your work?

21 A. So he didn't direct me how to
22 do it. He would just tell me okay, we are
23 putting the shed here, Lintech is doing the
24 electricity, the electric job here.

25 Q. During that time, how often

1 SINGH

2 would you put up and take down sidewalk
3 sheds?

4 A. Well, there is a base for the
5 shed so whenever we are done we take the shed
6 off and we take the panel of the electricity
7 off and everything.

8 Q. How many times a week would you
9 do that?

10 A. I used to work every day.

11 Q. Would you take down the sheds
12 every day?

13 A. We used to put it every day and
14 as they finish we used to start then taking
15 it off.

16 Q. So every day you would help
17 them put it up and every day you would help
18 them take it down; is that correct?

19 A. No, understand me what I'm
20 going to say to you so when we start putting
21 the shed, we put lights under it. Takes
22 about like after I put the -- takes about a
23 month or 20 days until we get done and then
24 we started taking it off.

25 Q. I'm confused so I just want to

1 SINGH

2 make sure that I have the right testimony.

3 Before you said that every day that you would
4 take down the sheds, you would dismantle the
5 sheds, is that true?

6 MR. MIZRAHI: You can translate.

7 A. Like okay so I'm going to tell
8 you how we do it like, for example, I put
9 shed A and then I put shed B and C and like
10 that so as they finish working in the
11 building so that shed because we continue
12 making them and once we have done them
13 before, we are done with them like we are
14 done using them, then we start taking those
15 down so it's like a chain of sheds.

16 Q. So you help put them up and you
17 help take them down, right?

18 MR. MIZRAHI: You can strike
19 that question. I'm going to rephrase
20 the question.

21 Q. So you help put up the sidewalk
22 sheds and you help take down the sidewalk
23 sheds; is that right?

24 A. Because I was electrician so I
25 didn't help them to put the sheds up or take

1 SINGH

2 down. My job was the electrician to take
3 care of the electricity.

4 Q. Did you ever from 2014 until
5 2018 perform any work that included putting
6 up or taking down sidewalk sheds?

7 A. So I don't -- according to my
8 memory I don't remember anything unless they
9 got my signature on something, but I don't
10 remember anything that I have worked with the
11 sheds. After that, after 2018, I worked with
12 the union. I work with them doing the sheds
13 up.

14 Q. But if your signature was on
15 something it would help you remember?

16 A. As an electrician with Lintech
17 I sign many times and if I have not done it,
18 maybe I haven't signed it.

19 MR. MIZRAHI: Madam Court
20 Reporter, could you re-ask the
21 question that was last posed.

22 (Record read.)

23 MR. MIZRAHI: Could you please
24 ask the question again. You can
25 translate.

1 SINGH

2 Q To get the license.

3 A Yes, I had spent money to obtain a
4 license, the fees, whatever the fees is.

5 Q And you needed the license to do that
6 kind of work; is that correct?

7 A I had told you earlier also that we
8 have to keep the licenses like OSHA and all of
9 the licenses if we need anything to do the
10 project.

11 Q Do you remember any projects that
12 required you to have this license?

13 A No. Since I got the license, after
14 that I started working with Lintech, started
15 working with Lintech. I used to do the
16 electrician work.

17 Q While you were working at Lintech did
18 you ever do any work that required you to put up
19 or take down scaffolding?

20 A No.

21 Q So why did you have a license for
22 putting up and taking down scaffolding?

23 MR. SILVER: Come on, you know
24 something, you've asked this four or
25 five times. You're not asking it

1 SINGH

2 Q When was this?

3 A When I started the work with them.

4 Q When was that?

5 A I started working with them in 2014, in
6 the last of 2014.

7 Q What month?

8 A I don't know the exact date, but it was
9 around the 10th or 11th month of 2014.

10 Q On how many other occasions did you
11 meet Mr. Tudor?

12 A I met him two, three times.

13 Q On what other occasions did you meet
14 Mr. Tudor?

15 A I met him at the Bedford in Brooklyn.

16 MR. SILVER: What was that word?

17 THE INTERPRETER: Bedford.

18 MR. SILVER: Oh, Bedford, all
19 right.

20 Q When was this?

21 A I met him that job.

22 Q When was that?

23 A Which year it was?

24 Q Approximately, yes?

25 A Around 2015.

1 SINGH

2 A No, I don't remember. I did not put
3 this thing in my head.

4 Q What kind of work did you perform on
5 Sundays?

6 A Private bridges. There used to be a
7 private bridge that I put the lights there. My
8 work was only electrician.

9 Q Mr. Singh, do you have any documents
10 relating to work that you performed on Sundays?

11 A No, there was no -- nothing there.
12 They never told me to sign anything.

13 Q Mr. Singh, how many NYCHA sites did you
14 work on in 2015?

15 A I'm not sure where I worked at the
16 NYCHA. I told you under also they send me from
17 one location to another location, the wires
18 charge, I have to put the lights there, so it's
19 like that.

20 Q Do you remember how many projects you
21 worked on for NYCHA in 2016?

22 A How many projects I work? Sometimes I
23 work there, sometimes it's one of the project,
24 sometimes I go there.

25 Q Do you remember how many NYCHA projects

1 SINGH

2 Q Mr. Singh, is this your signature?

3 A Yes, it is.

4 Q Mr. Singh, are these the last four
5 digits of your Social Security number?

6 A Yes.

7 Q Mr. Singh, is this your handwriting?

8 A No, this is not mine. They increased
9 time, decreased time here.

10 Q Mr. Singh, is this your handwriting?

11 A I'm not sure about this handwriting.

12 MR. MIZRAHI: For the record, we're
13 referring to the contents written under
14 sections time dash in and time dash
15 out.

16 MR. SILVER: I'm sorry, you asked
17 several questions about more than two
18 boxes. Which one is which?

19 Q Mr. Singh, who wrote this information
20 in this box?

21 A They put the time later and they just
22 make me to sign these and these (indicating.)

23 Q Mr. Singh, who recorded this
24 information?

25 A I don't know who. That's what I'm

1 SINGH

2 telling you the same thing. In the Rockaway I
3 had work and they did not make me to sign
4 anywhere.

5 Q Mr. Singh, I'm asking you a question
6 about a document that's in front of you that's
7 dated September 16, 2015. Do you see that date?

8 A Yes, I can see that.

9 Q Mr. Singh, the document reflects
10 certain hours that you worked on that date,
11 specifically it reflects hours beginning from
12 1:30 p.m. to 3 p.m. Do you see that?

13 MR. SILVER: I'm sorry, say that
14 again? Can I have the question back?

15 Q Do you see --

16 MR. MIZRAHI: Can I have -- I'm
17 sorry, go ahead.

18 Q Do you see these figures?

19 A Yes, I can see.

20 Q Do you see your signature next to these
21 figures?

22 A Yes, I can see that.

23 Q Mr. Singh, who recorded the information
24 in this document?

25 A This section, I don't know who recall

1 SINGH

2 this one.

3 Q Mr. Singh, how would someone record
4 this information if you didn't provide it to
5 them?

6 MR. SILVER: I'm sorry, you want
7 him to give --

8 MR. MIZRAHI: You can strike that
9 question. I can rephrase the question.

10 Q Mr. Singh, why would you sign a
11 document if there wasn't any information next to
12 it?

13 A Well, what should I give you the
14 answer? They asked me to sign it and whatever
15 the hour they put it on there.

16 Q Mr. Singh, how many hours did you work
17 for this week?

18 MR. SILVER: Which week?

19 Q For the week including September 16,
20 2015.

21 A I used to work in the morning until 5
22 p.m., and they put the timing on their own.

23 Q Mr. Singh, there's a second signature
24 at the bottom of the page. Do you see that?

25 A I don't know who sign.

1 SINGH

2 next to the hours that are worked?

3 A I don't know what is that, what 8 a.m.
4 in the morning and finish work at 5 p.m.

5 Q Mr. Singh, does your signature appear
6 on this document?

7 A Okay. They used to tell us that fill
8 this sheet, and time, they do it on their own.

9 Q Mr. Singh, does your signature appear
10 on this document?

11 MR. SILVER: You've asked that
12 already. What's the next question?
13 Stop, stop, stop. What else?

14 MR. MIZRAHI: Your client has not
15 answered the question.

16 MR. SILVER: He's answered several
17 times. Move on. Your time is limited.
18 You don't get to do this forever. You
19 get seven hours worth. You've already
20 spent, in all fairness, you had two
21 hours the last time, now you've gone
22 through three hours. If you want to
23 spend the remaining period of your time
24 doing this, repeating the same
25 questions, I don't see why.

1 SINGH

2 Q Mr. Singh, how much were you
3 compensated the week of November 8, 2015?

4 A How much I make for a week?

5 Q How much did you make the week of
6 November 8, 2015?

7 A They don't used to give me a weekly.
8 They used to give me 600, 700 or 900, around
9 there, for a month.

10 Q What is that number based on?

11 A They just give me cash.

12 Q Why would that figure increase or
13 decrease?

14 A They know that I don't know that.

15 Q Why sometimes 700 and sometime 800?

16 A Sometimes I work as a private on
17 Saturday, Sunday, that's the money they give it
18 to me.

19 Q Mr. Singh, how many hours did you work
20 the week ending November 8, 2015?

21 A All year?

22 Q How many hours did you work the week
23 ending November 8, 2015?

24 A I used to work from 8 a.m. every day
25 till 5 p.m. and I was continuously working and

1 SINGH

2 A In 2018 I used -- sometimes I used to
3 work, also.

4 Q At any point during this period did you
5 ever raise any issues with respect to how you
6 were paid, to your employers?

7 A I raised my voice against someone?

8 Q Did you ever speak with anybody about
9 issues regarding your compensation?

10 A They told me that they're going to make
11 me a union card and they're going to give me an
12 installment. I don't know many things. So I
13 spoke to a few people that they said it's like
14 that.

15 Q Mr. Singh, during the period that you
16 were working at Lintech, did you ever speak with
17 anybody about your concerns regarding how you
18 were paid?

19 A I did not talk to someone else. I'm
20 not that much educated person.

21 Q Did you ever speak with anybody at
22 Lintech about your compensation?

23 A If they had advised me that they were
24 going to provide me the money, it just stop
25 right now.

1 SINGH

2 A Yes, it is.

3 Q Mr. Singh, did you have an opportunity
4 to review this document with your attorney?

5 A I just signed it, this document. I
6 don't know what is in there, but if you repeat
7 it then I can tell you what is there, what is
8 not.

9 Q Mr. Singh, did you verify the accuracy
10 of the information in this document before you
11 had signed it?

12 A I had signed it. Whatever my attorney
13 has stated is correct.

14 Q Mr. Singh, did you review this document
15 before you signed it?

16 A That they had given me everything.

17 Q Mr. Singh, did you review this document
18 before you signed it?

19 A Whatever the thing is that I had given
20 to my attorney, my sister has translated for me,
21 and then I signed it.

22 Q Is the information in this document
23 true and correct, to the best of your knowledge?

24 A Yes, if it's written by my attorneys,
25 correct.